

1 Bruce J. Highman, (State Bar No. 101760)  
2 HIGHMAN & HIGHMAN  
3 A PROFESSIONAL LAW ASSOCIATION  
4 582 Market Street, Suite 1212  
5 San Francisco 94104  
6 Telephone: (415) 982-5563  
7 Fax: (415) 982-5202  
8 Email: bruce.highman@highmanlaw.com

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10 Attorneys for Plaintiff

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14 UNITED STATES DISTRICT COURT  
15 NORTHERN DISTRICT OF CALIFORNIA

16 CINDY COLLEY, an individual,

17 No. 22-cv-03884-HSG

18 Plaintiff,

19 STIPULATION TO EXTEND DEADLINE  
20 TO AMEND PLEADINGS;  
21 DECLARATION OF BRUCE HIGHMAN  
22 IN SUPPORT OF STIPULATION; ORDER

23 v.  
24 SNAPMEDTECH, INC. DBA  
25 SNAPNURSE, a corporation, and DOES 1-  
26 10, inclusive,

27 Defendants.

28 The parties hereto, by and through their respective attorneys, hereby stipulate to continuing  
the deadline for filing a motion to amend the complaint from December 16, 2022, to December 23,  
2022, for the reasons set forth in the Declaration of Bruce Highman below.

DATED: December 15, 2022

/s/ Bruce J. Highman

Bruce J. Highman  
Highman & Highman  
Attorneys for Plaintiff

DATED: December 15, 2022

/s/ Lonnie D. Giamela

Lonnie D. Giamela  
Fisher & Phillips LLP  
Attorneys for Defendant  
SnapMedTech, Inc. dba SnapNurse

27 DECLARATION OF BRUCE HIGHMAN

28 I, Bruce Highman, declare:

Stipulation to Extend Deadline to Amend Pleadings; Declaration; Order - No. 22-cv-03884-HSG

1       1. I am the attorney of record for plaintiff Cindy Colley.  
2       2. This case settled in principle at a mediation on December 12, 2022, contingent on the parties  
3 working out all the terms of a written settlement agreement and signing it. In the unlikely event the  
4 parties are unable to work out all the language of a written settlement agreement, I plan to file a motion  
5 for leave to file a third amended complaint. The Court's October 20, 2022 Scheduling Order (Dkt. 32)  
6 set December 16, 2022, as the deadline for amending the pleadings. The parties ask that this deadline  
7 be extended one week to December 23, 2022 because I believe that will allow the parties enough time  
8 to work out all the language of a written settlement agreement which will in turn allow me to avoid  
9 spending attorney time drafting the motion to amend

10       I declare under penalty of perjury under the laws of the United States that the foregoing is true  
11 and correct and that this declaration was executed on December 14, 2022.

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/s/ Bruce J. Highman

Bruce J. Highman

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ORDER

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

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DATED: 12/15/2022

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Honorable Haywood S. Gilliam, Jr.  
United States District Judge

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